


# NPDES Roundtable Meeting Agenda – Draft (1/2/2019)

## Skype Meeting, Hosted by North Coast Regional Water Board

January 9, 2019  
9:00 AM – 3:00 PM






To join the online meeting:  
See appointment for Skype Link

To join the teleconference only:  
+1 (888) 808-6929, access code: 460678

ITEM	1	Assigned to:	Time
Title of Topic	<b>INTRODUCTIONS/REVIEW AGENDA AND ACTION ITEMS</b>	Cathleen Goodwin Region 1	9:00-9:15 (15 minutes)
Purpose	Roll call and review agenda.  Region 1: Region 2: Region 3: Region 4: Region 5: Region 6: Region 7: Region 8: Region 9:  State Board:  EPA:  PG Environmental:		
Desired Outcome	Get attendance and finalize agenda.		
Background			
Attachments/ Links:	 Minutes - Oct 18 2018 NPDES RT_final.c		
Contact Person	Cathleen Goodwin (707-576-2687), <a href="mailto:Cathleen.Goodwin@waterboards.ca.gov">Cathleen.Goodwin@waterboards.ca.gov</a> Heaven Moore (707-576-2753), <a href="mailto:Heaven.Moore@waterboards.ca.gov">Heaven.Moore@waterboards.ca.gov</a>		
Notes			
Decisions			
Action Items			

ITEM	2	Assigned to:	Time
Title of Topic	<b>SWRCB NPDES PROJECT UPDATES</b>	SWRCB-DWQ	9:15-9:45 (30 Minutes)

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<b>Purpose</b>	Update NPDES Roundtable regarding several SWRCB Projects and Statewide Language Implementation
<b>Desired Outcome</b>	Update the Roundtable
<b>Background</b>	Update the NPDES Roundtable on: <ol style="list-style-type: none"> <li>1. Pretreatment Standard Operating Procedures</li> <li>2. NPDES Administrative Procedure Manual Update</li> <li>3. Permit Template Revisions for Bacteria and Toxicity Language</li> <li>4. NPDES Quality Assurance Program Plan Implementation</li> </ol>
<b>Attachments/ Links:</b>	 NPDES QA Implementation  NPDES APM Update ProjWorkplan July 2018.  2015 NPDES APM.docx  Standard Operating Procedures  Standard Operating Procedures
<b>Contact Person</b>	Afrooz Farsimadan (916) 341-5544 Renan Jauregui (916) 341-5505 Armando Martinez (916) 341-5586
<b>Notes</b>	
<b>Decisions</b>	
<b>Action Items</b>	

ITEM	3	Assigned to:	Time
<b>Title of Topic</b>	<b>RECYCLED WATER REPORTING REQUIREMENTS PER THE RECYCLED WATER POLICY</b>	Rebecca Greenwood State Board	9:45-10:15 (30 Minutes)
<b>Purpose</b>	To inform the NPDES Roundtable of the new recycled water reporting requirements to be implemented per the recently adopted Recycled Water Policy.		
<b>Desired Outcome</b>	Information sharing		
<b>Background</b>	On December 11, 2018 the State Board adopted an amendment to the Recycled Water Policy. This discussion will focus on implementation of the new wastewater and recycled water reporting requirements that are part of the Policy amendment.		
<b>Attachments/ Links:</b>			
<b>Contact Person</b>	Rebecca Greenwood – 916-341-5858, <a href="mailto:rebecca.greenwood@waterboards.ca.gov">rebecca.greenwood@waterboards.ca.gov</a>		
<b>Notes</b>			
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ITEM	4	Assigned to:	Time
<b>Title of Topic</b>	<b>SUFFICIENTLY SENSITIVE METHODS RULE IMPLEMENTATION</b>	Jim Marshall Region 5	10:15-10:30 (15 Minutes)
<b>Purpose</b>	Share information and receive feedback from other Regions that are implementing the SSM Rule.		
<b>Desired Outcome</b>	Information sharing/feedback		
<b>Background</b>	<p>With the recently promulgated Sufficiently Sensitive Methods Rule (SSM Rule), for many constituents the SIP Minimum Levels are no longer the driving factor for the laboratory Reporting Levels that Discharger's must meet when submitting monitoring data required by NPDES permits. Region 5 has been working on developing a process to implement the SSM Rule in a manner that is clear and efficient for Dischargers and staff.</p> <p>The SSM Rule requires Dischargers use laboratory Reporting Levels that are closest to or below applicable water quality objectives considering the capability of commercial laboratories. Region 5 has developed a revised version of our Effluent and Receiving Water Characterization Table that includes the maximum allowed reporting levels for each constituent that we determined to be in compliance with the SSM Rule based on a survey of commercial laboratories within our Region.</p> <p>Region 5 staff have been focusing on this effort for some time now with the ultimate goal that the use of lower RLs will result in higher quality data that can be used for data evaluations.</p> <p>We are interested in input related to the following:</p> <ol style="list-style-type: none"> <li>1. We have surveyed commercial laboratories within our region to determine laboratory capabilities in terms of MDLs and RLs. Have other Regions done the same? How many labs should be surveyed? How often to re-survey?</li> <li>2. We plan to list Max RLs in the MRP table for the Effluent and Receiving Water Characterization Monitoring to provide clear direction to dischargers for SSM Rule compliance, and to make the process of evaluating compliance with the SSM Rule more consistent and easier on staff. What are other Regions doing?</li> <li>3. It is unclear in the SSM Rule whether economic considerations can be made on a case-by-case basis. We have small disadvantaged communities where it would be difficult to have samples delivered to the labs that can meet the RLs that we have determined complies with the SSM Rule. Does USEPA have any guidance regarding the allowance for exceptions on a case-by-case basis? What would be some of the considerations?</li> </ol>		
<b>Attachments/ Links:</b>			
<b>Contact Person</b>	Jim Marshall (916-464-4772), <a href="mailto:james.marshall@waterboards.ca.gov">james.marshall@waterboards.ca.gov</a> Dania Jimmerson (916-464-4742), <a href="mailto:dania.jimmerson@waterboards.ca.gov">dania.jimmerson@waterboards.ca.gov</a>		
<b>Notes</b>			
<b>Decisions</b>			



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**BREAK**  
**10:30-10:45**  
**(15 minutes)**

ITEM	5	Assigned to:	Time
<b>Title of Topic</b>	<b>REGION 1 WATER QUALITY TRADING FRAMEWORK FOR THE LAGUNA DE SANTA ROSA</b>	David Kuszmar/Lisa Bernard (R1)	10:45-11:15 (30 minutes)
<b>Purpose</b>	Provide an overview of the Region 1 Water Quality Trading Framework for the Laguna de Santa Rosa		
<b>Desired Outcome</b>	Information sharing		
<b>Background</b>	<p>On July 11, 2018, the North Coast Regional Water Board adopted Resolution No. R1-2018-0025 approving the Water Quality Trading Framework for the Laguna de Santa Rosa Watershed (Laguna WQT Framework).</p> <p>The Laguna WQT Framework is a revised, expanded, and improved version of the Santa Rosa Nutrient Offset Program, and is available to both the City of Santa Rosa and the Town of Windsor as an approved means of complying with “no net loading” effluent limitations for total phosphorus in each of their NPDES permits. The Framework encourages the City and the Town to achieve compliance by implementing multi-benefit pollution reduction actions and ecosystem restoration projects within the Laguna watershed in lieu of facility upgrades that are more costly and less effective for achieving phosphorus reductions that are needed in the Laguna.</p> <p>The Laguna WQT Framework is the first of its kind in California. Its provisions are based on USEPA policy, guidance from national experts, and years of collaborative discussions with local stakeholders. If successfully implemented, it will serve as proof-of-concept for the expanded future use of water quality trading as a viable element of the North Coast Regional Water Board’s comprehensive strategy for beneficial use recovery in the Laguna de Santa Rosa.</p>		
<b>Attachments/ Links:</b>	Links to the Laguna WQT Framework, the adopting Resolution, and the subject NPDES permit are available here: <a href="https://www.waterboards.ca.gov/northcoast/water_issues/programs/nutrient_offset_program/">https://www.waterboards.ca.gov/northcoast/water_issues/programs/nutrient_offset_program/</a>		
<b>Contact Person</b>	David Kuszmar (707-2693), <a href="mailto:David.Kuszmar@waterboards.ca.gov">David.Kuszmar@waterboards.ca.gov</a> Lisa Bernard (707-576-2677), <a href="mailto:Lisa.Bernard@waterboards.ca.gov">Lisa.Bernard@waterboards.ca.gov</a>		
<b>Notes</b>			
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ITEM	6	Assigned to:	Time
Title of Topic	<b>UPDATE ON THE STATE SSS WDR REISSUANCE</b>	SWRCB-DWQ	11:15-11:35 (20 minutes)
Purpose	Update the Roundtable regarding the State SSS WDR Reissuance		
Desired Outcome	Information sharing		
Background	An update was provided at the October 18, 2018 NPDES Roundtable meeting that generated much discussion about the use of a subcommittee as the avenue for Regional Boards to provide input on the WDR revision. The attached documents show the WDR reissuance schedule and the project charter for discussion.		
Attachments/ Links:	 SSS WDR Reissuance Schedule  SSS WDR Reissuance Project Charter		
Contact Person	Afrooz Farsimadan (916) 341-5544 Armando Martinez (916) 341-5586		
Notes			
Decisions			
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ITEM	7	Assigned to:	Time
Title of Topic	<b>UPDATE ON EPA NPDES PERMITS PERFORMANCE CRITERIA</b>	EPA	11:35-12:00 (25 minutes)
Purpose	EPA has been working to develop performance criteria that would allow EPA to evaluate programs across states as far as implementation of programs receiving grant funding. EPA has discussed the criteria at past roundtables and would like to share the draft results and status of the project during this roundtable meeting.		
Desired Outcome	Information sharing and review of draft pilot results		
Background	EPA R9 will be developing criteria in collaboration with states (and each RB) for each program that receives funding from EPA. The NPDES permitting program was selected as a pilot. The purpose of the criteria is to assess relative performance across states and programs as well as making EPA's expectations as transparent as possible. EPA presented draft criteria at the January 2018 roundtable, had a subsequent call on February 20, and discussed the status of the pilot on the April 2018 roundtable.		
Attachments/ Links:	Power Point presentation to come		
Contact Person	Becky Mitschele, 415-972-3492 or <a href="mailto:mitschele.becky@epa.gov">mitschele.becky@epa.gov</a>		
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**LUNCH BREAK**  
**12:00-1:00**  
**(1 hour)**

ITEM	8	Assigned to:	Time
<b>Title of Topic</b>	<b>PERMIT ISSUANCE PLANS FOR SFY18-19 AND SFY 19-20</b>	EPA	1:00-1:20 (20 minutes)
<b>Purpose</b>	Update NPDES staff		
<b>Desired Outcome</b>	Information sharing and preview of template for permit issuance plan, as required by the 106 workplan		
<b>Background</b>	EPA expects the SB to work with the RBs to reduce the NPDES permit backlog as well as provide the permit issuance plan as required by the 106 workplan. Specifically, the 106 workplan requires that the SB based on input from each RB prepare semi-annual updates to the annual permit issuance plan due March 1 and September 1. By March 1 of each year, the SB will also prepare based on RB input a permit issuance plan for the upcoming SFY (July to June). Proposed permit issuance dates are to be provided at least 6 months prior to permit expiration.		
<b>Attachments/ Links:</b>	 2018 - 2019 Permit Issuance Plan2.xlsx		
<b>Contact Person</b>	Becky Mitschele, 415-972-3492		
<b>Notes</b>			
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ITEM	9	Assigned to:	Time
<b>Title of Topic</b>	<b>EPA GENERAL UPDATES</b>	EPA	1:20-1:35 (15 minutes)
<b>Purpose</b>	Status updates regarding EPA rulemakings, management changes, and upcoming PQR		
<b>Desired Outcome</b>	Information sharing		
<b>Background</b>	1. Rulemakings a. NPDES Application and Program Updates b. Peak flows management c. Waters of the U.S. proposed rulemaking closes 60 days from publication in FR  2. NPDES Section Chief – Elizabeth Sablad  3. CA Permit Quality Review (PQR)		

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<b>Attachments/ Links:</b>	<p>1. Links to EPA rulemakings  <a href="https://www.epa.gov/npdes/npdes-application-and-program-updates">https://www.epa.gov/npdes/npdes-application-and-program-updates</a>  <a href="https://www.epa.gov/npdes/peak-flows-sewage-treatment-plants">https://www.epa.gov/npdes/peak-flows-sewage-treatment-plants</a>  <a href="https://www.epa.gov/wotus-rule/step-two-revise">https://www.epa.gov/wotus-rule/step-two-revise</a> and direct link to signed pre-publication version <a href="https://www.epa.gov/wotus-rule/revised-definition-waters-united-states-proposed-rule">https://www.epa.gov/wotus-rule/revised-definition-waters-united-states-proposed-rule</a></p> <p>3. Link to 2014 CA PQR for SB, RB2, RB4, RB5, and RB9  <a href="https://www.epa.gov/sites/production/files/2015-09/documents/pqr_california_report.pdf">https://www.epa.gov/sites/production/files/2015-09/documents/pqr_california_report.pdf</a></p>
<b>Contact Person</b>	Becky Mitschele, 415-972-3492 or <a href="mailto:mitschele.becky@epa.gov">mitschele.becky@epa.gov</a>
<b>Notes</b>	
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ITEM	10	Assigned to:	Time
<b>Title of Topic</b>	<b>DFA UPDATE REGARDING PROCESSING OF CWSRF APPLICATIONS</b>	Jim Maughan	1:35-2:10 (35 Minutes)
<b>Purpose</b>	To provide an overview regarding the processing and approval of applications for grant/loan funding		
<b>Desired Outcome</b>	To help Regional Board staff to understand the DFA funding application process and to provide an update on the status of applications currently being processed		
<b>Background</b>	<p>In November 2018, DFA released its 2018/2019 Clean Water State Revolving Fund (CWSRF) Intended Use Plan. This report provides the current financial outlook for the CWSRF and complementary funding programs and an analysis of the programs' abilities to finance eligible programs.</p> <p>DFA staff will provide an overview regarding the processing and approval of applications, how DFA works with applicants to help them to submit complete applications, and how Regional Board staff can assist in making the process as smooth as possible. Questions that will be addressed during this discussion include:</p> <ol style="list-style-type: none"> <li>1. How many DFA staff are working on reviewing applications?</li> <li>2. What are the review steps, and how long does the process take once an application is complete?</li> <li>3. How do you work with an applicant when the application is determined to be incomplete?</li> <li>4. How can regional board staff assist your staff to help the approval process along (without slowing your staff down by checking in too often)? Some of my small facilities ask me regularly why their application is taking so long to process. What are some key things that we can tell them? Are there things that regional board staff can advise them on to improve their chances of submitting a complete application?</li> <li>5. What determines the amount of grant funding vs. loan funding that an applicant receives?</li> </ol>		

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<b>Attachments/ Links:</b>	<a href="https://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/november_2018_cwsrf_iup_update.pdf">https://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/november_2018_cwsrf_iup_update.pdf</a>
<b>Contact Person</b>	Jim Maughan, (916-341-5694), <a href="mailto:james.maughan@waterboards.ca.gov">james.maughan@waterboards.ca.gov</a>
<b>Notes</b>	
<b>Decisions</b>	
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ITEM	11	Assigned to:	Time
<b>Title of Topic:</b>	<b>REGION 1 UPDATE ON RECENT PERMIT LANGUAGE MODIFICATIONS</b>	Heaven Moore	2:10-2:30 (20 minutes)
<b>Purpose:</b>	Share information and receive feedback regarding proposed changes to permit language in Region 1 permits.		
<b>Desired Outcome:</b>	Information sharing and feedback.		



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<b>Background:</b>	<p>Region 1 staff have identified several permit language issues during the development of a few recent permits. We are interested in feedback from the NPDES Roundtable group on the following:</p> <ol style="list-style-type: none"> <li>1. Permit language to clarify that dischargers are not exempt from regulations that are not specifically addressed in their permit. For example, we are developing a permit for a sawmill and this permit's Solids Disposal and Handling Requirements allow the potential for burning of waste piles as a solids disposal method. Our new NPDES Program Manager said that permits that she wrote in her prior position included language to inform permittees that they must comply with regulations of other agencies as they implement requirements of their NPDES permit. In this sawmill example, such language would be intended to clarify that the discharger must comply with air quality regulations and local regulations related to burning.</li> <li>2. If a permit receiving water limitation is expressed in a manner that implies the possibility of continuous monitoring, are we mandated to require continuous monitoring or do we have flexibility to require grab sampling if grab sampling demonstrates that there is little threat of violating the limit? We encountered this situation recently as we have a new Basin Plan receiving water limitation for dissolved oxygen that establishes a daily minimum of 9.0 mg/L and a 7-day moving average of 11.0 mg/L. In order to clearly demonstrate that there are never excursions of the minimum or the 7-day moving average, one would technically need continuous monitoring due to the diel nature of DO. Requiring continuous receiving water monitoring is costly and difficult, therefore, for cost of compliance and practical reasons, we are not requiring continuous monitoring based on an analysis of existing monthly upstream and downstream monitoring data. How do other Regional Boards establish receiving water monitoring requirements in situations like this?</li> <li>3. How do other regional boards address monitoring for short hold-time and field parameters? Region 1 has formerly included language in the MRP that allows dischargers to analyze pollutants with short hold times provided that they have SOPs that identify QA/QC procedures to be followed to ensure accurate results. We recently modified the language to specifically identify field measurements rather than leaving it to the readers interpretation as to whether field measurements are included in the definition of short hold time parameters.</li> <li>4. How do other regional boards allow dischargers to demonstrate adequate dechlorination? Do your permits have language that provides flexibility to demonstrate proper dechlorination through measuring chlorine residual, dechlor chemical residual (i.e., bisulfite residual), ORP meters?</li> </ol>
<b>Attachments/ Links:</b>	
<b>Contact Person:</b>	Heaven Moore, (707-576-2753), <a href="mailto:Heaven.Moore@waterboards.ca.gov">Heaven.Moore@waterboards.ca.gov</a>
<b>Notes:</b>	
<b>Decisions:</b>	
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ITEM	12	Assigned to:	Time
<b>Title of Topic</b>	<b>REGIONAL BOARD UPDATES</b>	All	2:30-2:45 (15 minutes)
<b>Purpose</b>	Brief Updates on Regional Board issues		
<b>Desired Outcome</b>	Information Sharing		
<b>Notes</b>			
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ITEM	13	Assigned to:	Time
<b>Title of Topic</b>	<b>WRAP UP</b>	Cathleen Goodwin Heaven Moore	2:45-3:00 (15 minutes)
<b>Purpose</b>	Wrap Up and Conclude Meeting		
<b>Desired Outcome</b>	Summarize action items from this meeting, potential agenda items for future meetings, and confirm future meeting date.		
<b>Background</b>	Discuss next quarterly meeting location and decide whether teleconference or face to face. Decide on note taker.		
<b>Attachments/ Links:</b>			
<b>Contact Person</b>	Cathleen Goodwin (707-576-2687), <a href="mailto:Cathleen.Goodwin@waterboards.ca.gov">Cathleen.Goodwin@waterboards.ca.gov</a> Heaven Moore (707-576-2753), <a href="mailto:Heaven.Moore@waterboards.ca.gov">Heaven.Moore@waterboards.ca.gov</a>		
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